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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE MARILYN L. HUFF)

UNITED STATES OF AMERICA,
Plaintiff,
v.

ESMERALDA SALAZAR-
SANDOVAL
Defendant.

CASE NO. 08CR0285-MLH

Date: May 12, 2008
Time: 2:00 p.m.

**NOTICE OF MOTION AND
MOTION FOR AN ORDER
ALLOWING THE DEPOSITION
OF DELORES SANDOVAL
PERALES OR ALTERNATIVELY,
THE ADMISSION IN EVIDENCE
OF SWORN VIDEOTAPED
STATEMENT**

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
REBECCA S. KANTER, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on May 12, 2008 at 2:00 p.m., Ms. Salazar-Sandoval, the accused in this case, by and through her attorneys, Reuben Camper Cahn, Leila W. Morgan and Federal Defenders of San Diego, Inc., will request this Court to enter an order granting the following motion.

MOTION

Esmeralda Salazar Sandoval, through undersigned counsel and pursuant to Fed. R. Crim. P. 15, Fed. R. Evid. 807, and the Sixth Amendment, moves for an order allowing a deposition of Delores Sandoval Perales or in the alternative for the admission in evidence of the statement of the sworn videotaped statement of Delores Sandoval Perales taken on April 4 , 2008.

Respectfully submitted,

DATED: April 28, 2008

/s/ Reuben Camper Cahn
REUBEN CAMPER CAHN
LEILA W. MORGAN
Federal Defenders of San Diego, Inc.
Attorney for Ms. Salazar-Sandoval